



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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July 30, 2020

Mr. Brian Olson, Director
Office of Site Remediation and Restoration
U.S. Environmental Protection Agency Region 1
5 Post Office Square, Suite 100
Mail Code: OSRR07-03
Boston, MA 02114-2023

Re: State Concurrence Determination
Record of Decision
Nyanza Chemical Waste Dump Superfund Site - Operable Unit #2
Ashland, MA

Dear Mr. Olson:

The Department of Environmental Protection (MassDEP) has reviewed the Record of Decision (ROD) and selected remedy recommended by the U.S. Environmental Protection Agency (EPA) for cleanup of Operable Unit #2 (OU2) of the Nyanza Chemical Waste Dump Superfund site (Site) in Ashland, MA. This letter provides MassDEP's concurrence with EPA's selected remedy for OU2 of the Site, as discussed below.

The selected remedy addresses threats from exposure to Site-related groundwater contamination and associated trench and indoor air vapors. The main components of the selected remedy include:

- A pre-design investigation (PDI) to locate additional DNAPL within the source area;
- If recoverable DNAPL is located, field scale pilot testing, installation and operation of additional DNAPL recovery wells;
- Optimization of the two existing DNAPL recovery systems (if still viable) to increase DNAPL recovery;
- Groundwater evaluations and field-scale pilot testing of in-situ chemical oxidation (ISCO) groundwater treatment;

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

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- ISCO treatment targeting groundwater within the deep overburden and shallow bedrock in the source area;
- Expansion of the groundwater monitoring well network and long-term groundwater monitoring;
- Supplemental institutional controls to require vapor intrusion evaluations and/or installation of vapor mitigation systems at new, renovated, or expanded buildings within the VOC plume; and
- Continued operation, maintenance, monitoring and repair of 43 existing VMS in the VMA until future risk evaluations determine that the VMS are no longer needed.

The selected remedy, along with remedy components already in place from the 1991 Interim ROD and the 2006 ESD, is a comprehensive approach that is protective of human health and the environment; uses proven cleanup technologies such as contaminant extraction/recovery, in-situ treatment, and institutional controls; and the remedy is also cost effective in achieving the site-specific cleanup objectives in a reasonable timeframe.

MassDEP agrees with the conclusions in the ROD and therefore agrees with the Selected Remedy for OU2 of the Site.

If you have any questions regarding this letter please contact the MassDEP project manager, Jennifer McWeeney, at 617-654-6560, or Diane Baxter, Division Director of Federal Grant Programs, at 617-292-5697.

Sincerely,



Paul W. Locke
Assistant Commissioner
MassDEP BWSC

Cc: Lisa Thuot, USEPA project manager